

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2017-244-E

| | | |
|-------------------------------------|---|-----------------------|
| In the Matter of: |) | |
| |) | |
| |) | |
| Petition of South Carolina Electric |) | PETITION TO INTERVENE |
| & Gas Company for Prudency |) | |
| Determination Regarding |) | |
| Abandonment, Amendments to the |) | |
| Construction Schedule, Capital Cost |) | |
| Schedule, and Other Terms of the |) | |
| BLRA Orders for the V.C. Summer |) | |
| Units 2 and 3 and Related Matters, |) | |
| along with a Motion for Expedited |) | |
| Hearing |) | |
| |) | |

The South Carolina Coastal Conservation League (“CCL”) hereby petitions the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission’s rules. In support of this petition, Petitioner states as follows:

1. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. CCL promotes the implementation of comprehensive local, state, and federal energy policies related to renewable energy, energy efficiency, and climate change. CCL has members in South Carolina who receive electricity service from SCE&G and are subject to the impacts of SCE&G’s resource decisions.

2. CCL has participated in numerous prior proceedings related to, among other things, the V.C. Summer nuclear units and SCE&G’s resource planning and energy efficiency

programs. CCL seeks to intervene in this proceeding to ensure that its members' interests in promoting clean energy resources are represented.

3. The Office of Regulatory Staff ("ORS") filed on August 9, 2017, a Motion to Dismiss the SCE&G Petition. If allowed to intervene, CCL will support the Motion to Dismiss for the reasons articulated in ORS's Motion. In addition, CCL notes that the two stated purposes of the Base Load Review are "to provide for the recovery of prudently incurred costs associated with *new base load plants*" and to "protect[] customers of investor-owned electrical utilities from responsibility for imprudent financial obligations or costs." Base Load Review Act at Section 1(A) (emphasis added). There is no longer a "new base load plant," as set out in the purposes of the Act, with which costs are associated and that is "intended in whole or in part to serve retail customers of a utility in South Carolina." S.C. Code § 58-33-220(2). Rather, the costs SCE&G seeks to recover are associated with an abandoned, partial plant. In the absence of any "new base load plant," the second purpose of the Act—protecting customers from imprudent financial obligations or costs—must be effectuated. In this regard, CCL has long argued for general principles of energy conservation, planning, and risk management that should be implemented with or without a new nuclear plant, and that become more urgent with its abandonment. The event of abandonment calls for investigation, both backward looking and flexible forward-looking determinations regarding costs and public policy, and measures such as utility funded efficiency programs that would lower customer bills. Section 58-33-280(K) of the Base Load Review Act is the more appropriate statutory authority under which to make those determinations.

4. CCL has not otherwise formulated its position in this proceeding. If SCE&G's petition is not dismissed, CCL plans to present its position in prefiled testimony.

5. CCL is represented by the following counsel in this proceeding:

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WHEREFORE, CCL prays that it be allowed to intervene in this matter.

Respectfully submitted this 11th day of August, 2017.

s/ J. Blanding Holman, IV
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*Attorney for Petitioner South Carolina Coastal
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Hearing)

CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the foregoing Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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This 11th day of August, 2017.

s/ Anna M. Crowder